Site Name:	**West Bank**
Date:	**8 November 1989**
Subject:	**POLREP #11 - Removal Action**
Location:	**Site #95** **West Bank of the Merrimack River** **Nashua, New Hampshire**
Pollutant:	Asbestos
Occurrence Date:	1960's
Environmental Media affected:	Land, water, air
Severity:	Potentially - Major
Quantity Discharged:	Unknown
Category:	Onshore/Non-transportation
Source:	Dumping of asbestos waste materials by Johns-Manville
Region:	U.S. EPA Region I
Latest POLREP:	POLREP 10 - October 17, 1989

U.S. ENVIRONMENTAL PROTECTION AGENCY
On-Scene Coordinator (OSC):
Paul R. Groulx (Lexington, MA) (617) 860-4308

Technical Assistance Team (TAT) Member:
Molly Elder Boich (Burlington, MA) (617) 229-6430

U.S. ARMY CORPS OF ENGINEERS
Project Engineer:
Paul Battista (Nashua Field Office) (603) 886-5124
Robert Marshall (603) 886-1539
Fort Devens, Avon, MA (508) 772-0159

Project Manager:
Tony Riccio (Waltham, MA) (617) 647-8605

I. Background:

The West Bank asbestos waste site is situated in Nashua, New Hampshire, along the Merrimack River (Tax map reference #24, lot #18). The site is located immediately downstream of Taylor's Fall Bridge on Route 111, lying to the south of Hollis and Crown Streets. The property is owned by the City of Nashua, and is utilized by the U.S. Army Corps of Engineers (ACOE) as a flood control dike area. The site consists of a 25 foot slope extending approximately 1,000 feet along the west shore of the Merrimack River. Asbestos plate board, intermixed with baghouse waste, was fully and partially exposed from below the waterline to the top edge of the slope.

The removal action is being managed by the U.S. ACOE under an interagency agreement (IAG) with the U.S. Environmental Protection Agency (EPA). Two other sites in Nashua, New Hampshire are included in the same U.S. ACOE asbestos abatement project solicitation # DCAW33-89-B-0010. These two sites, referred to as the Pine/Nowell Street and Oakland Street sites, are being documented in separate pollution reports.

II. Actions Taken:

October 17, 1989 — TAT conducted a site inspection for the U.S. EPA. Additional gravel fill had been placed over the portion of the slope not yet covered with stone bedding. Small asbestos fragments were still observed along the dike and access ramp. Small tile chips were visible on the dirt road (plateau) between the dike and the slope. A Zoppo representative informed TAT that the industrial hygienist had been released from the site on October 13, 1989, because industrial hygiene requirements had been completed.

October 19, 1989 — TAT conducted a site inspection for the U.S. EPA. Stone bedding and rip rap still appeared to cover approximately one half of slope. Exposed asbestos was observed in the same areas as in the previous visit. No industrial hygienist was present on site.

October 24, 1989 — TAT conducted a site visit for the U.S. EPA. There was no construction activity, and no ACOE or Zoppo personnel were on site. The elevation of the Merrimack River was significantly higher than usual. The waterline measure on the first pillar of the Taylor Falls Bridge read 10 feet. Rainfall and the elevated river had caused erosion on those portions of the slope not yet covered with stone protection. Erosion gullies and holes at the top of the slope contained exposed asbestos plateboard, tile, and baghouse wastes. More fragments and tile chips than usual were observed on the dike and plateau. Fresh motorcycle tracks were observed on the dike.

October 25, 1989 — During a telephone conversation with TAT, a Zoppo representative verified that elevation of the river had prevented construction activities since October 23rd. Work was not expected to resume until October 27th. In response to a telephone call from the OSC concerning erosion, exposed asbestos, lack of security, and no industrial hygienist, ACOE said they would inspect the site on October 26th.

October 27, 1989 — TAT conducted a site inspection and took photographs for the U.S. EPA. Construction activities had not resumed and no ACOE or Zoppo personnel were on site. The elevation of the river had dropped 2 3/4 feet since October 25th

but was still high. The worst erosion gully had been covered with gravel fill. However, smaller eroded areas still showed exposed asbestos, including baghouse wastes. Several fragments and tile chips were still visible on the dike, plateau, access ramps, and the paved road.

October 30, 1989 — TAT conducted a site inspection for the U.S. EPA. Zoppo and ACOE representatives agreed that exposed fragments and tile chips would be individually picked up whenever they were visible. The wood chip pile on top of the dike was pointed out to the ACOE and Zoppo to contain asbestos waste, which was washing onto the paved road (off-site). No industrial hygienist was on site.

November 1, 1989 — The OSC and Dan Speer from the NH Department of Environmental Services conducted a site inspection. The dike had been covered with gravel fill in those areas identified as having the most fragments and tile chips. The large erosion hole on the north end of the dike had been covered with clean gravel fill. No industrial hygienist was on site.

November 2, 1989 — The OSC discussed with the ACOE representative his concerns over having no industrial hygienist on site.

November 3, 1989 — TAT conducted a site inspection for the U.S. EPA. The wood chip pile had been removed and disposed of at the Nashua Landfill as asbestos contaminated material. Exposed baghouse wastes had been covered. Additional rains had washed portions of the gravel fill, which had been placed earlier in the week, off of the dike. Exposed asbestos was observed on and off of the site where the woodchip pile had been. No industrial hygienist was present on site.

November 7, 1989 — A meeting was held at the West Bank Site to address some problems. Persons present included: U.S. ACOE Project Engineer Paul Battista; U.S. ACOE Design Engineer Tim Beauchman; U.S. ACOE Construction Engineer Bob Marshall; R. Zoppo Co. Inc. Superintendent Al Disalvo; Cashins & Associates, Inc. Industrial Hygienist Steve Zack; and TAT member Molly Elder Boich, representing the U.S. EPA. The following points were discussed:

- The area of the woodchip pile was covered with clean fill.

- ACOE noted that the size of the rip rap was slightly smaller than specification.

- ACOE noted that the area where the erosion hole had occurred (top of slope on northern end) had not been properly covered and that excavation in this area would be required to place the proper amount of stone bedding and fill.

- Visible asbestos fragments and tile chips on the plateau and dike were pointed out to ACOE representatives. Handpicking the individual fragments no longer appeared to be an effective solution. Potential abatement alternatives for the dike were discussed.

- The erosion of the dike, caused by heavy equipment tracks and subsequent rains, was observed. Most of the visible asbestos fragments on the dike appear to be in eroded areas. The TAT member noted that dike scarring was increasing.

- The ACOE representative was informed of the need to remove asbestos fragments on the plateau, where equipment could run over them.

- All persons present were notified by Zoppo that an excavation of the transition area (key) is scheduled for tomorrow morning.

- ACOE made arrangements to have industrial hygienist back on site on a daily basis. Air monitoring program will be conducted during remaining removal activities.

November 8, 1989 — TAT conducted a site inspection for the U.S. EPA. Zoppo began excavation at the bottom of the slope on the south end. TAT photographed the excavation activities. The excavation line on the southernmost edge of construction on the slope showed a soil profile approximately 1.5 to 2 feet deep, and did not appear to contain visible asbestos. All material removed was disposed of at the Nashua Landfill as asbestos-contaminated material. An industrial hygienist was back on site conducting an air monitoring program. Zoppo's objective was to complete all

excavation and placement of stone bedding and rip rap on the bottom half of the entire length of slope so that the crane operator could be released. The top portion of the slope could then be completed with other heavy equipment.

III. Future Actions:

- Complete extension of the toe of the slope, and activities on the bottom portion of the slope: Estimated to be complete by 11/9/89.

- Continue to place stone bedding and rip rap on upper portion of slope: Estimated to be complete by 11/17/89.

- Complete all excavations required to make grades consistent: Estimated to be complete by 11/14/89.

- Top soil and seed plateau: Estimate pending possible change in plans to use filter fabric.

- Rake and seed dike: Estimated to complete by 11/22/89.

- Dismantle trailers and return site to original condition: Estimated to be complete by 11/30/89.

IV. Funding Status:

U.S. EPA obligated an additional $100,000 to this site, increasing the TOTAL PROJECT CEILING TO $750,000.

Financial Data:

DOCUMENT CONTROL NUMBER	ACCOUNT NUMBER	DOLLAR AMOUNT	COST ALLOCATION
Z30006	7QFA1ANE95	$507,000	US Army COE
ER0028	8TFA1ANE95	$100,000	US Army COE
		$103,000	TAT
		$ 40,000	Intramural
TOTAL PROJECT CEILING		$750,000	

CASE PENDS:

Paul R. Groulx

Paul R. Groulx, On-Scene Coordinator